

REMARKS

Claims 11 and 12 have been cancelled without prejudice. Claim 10 has been amended to more particularly point out and distinctly claim the subject matter of the present invention. No new matter has been added. Claims 1-10 and 13-24 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

I. The 35 U.S.C. 101 Rejection of Claims 10-15 Should be Withdrawn

The Examiner rejected claims 10-15 under 35 U.S.C. 101 as directed to non-statutory subject matter. *Office Action*, Page 2. The applicants have amended claim 10 to more particularly point out and distinctly claim the subject matter of the present invention. In view of the amendment, the applicants respectfully request the Examiner to withdraw the rejection.

II. The Rejection Under 35 U.S.C. 102(e) as Anticipated by the Huntington Reference Should be Withdrawn

The Examiner rejected each of the pending claims under 35 U.S.C. 102(e) as being anticipated by Publication Number US 2001/0047472 A1 to Huntington et al. ("the Huntington reference"). *Office Action*, Pages 2-3. The Huntington reference discloses a method of altering a start-up sequence of an operating system. During a boot sequence, a player searches for instructions in a second storage element. *Huntington reference*, Paragraph [0017]. The instructions relate to an event (or condition) which may occur during the boot sequence. *Id.* If the event occurs during the boot sequence, the player writes instructions to a first storage

element. *Id.* If the event does not occur, no additional actions are taken during the boot sequence. *Id.* The process then continues to an operating system start sequence where a product controller checks the first storage element to determine if any instructions were written to the first storage element. *Id.* If instructions are present, the controller executes the instructions. *Id.* If no instructions are present, the controller executes the existing start sequence. *Id.*

Initially, the applicants respectfully submit that the Examiner merely recited the elements of the claims and made a broad statement about the Huntington reference disclosing the elements without specifically stating how the reference discloses (or mapping the disclosure) to each of the claim elements. Thus, the applicants are left to speculate as to how the Examiner believes the Huntington reference discloses the present claims, but will do their best to address the rejection.

Claim 1 of the present invention recites a plug-in data structure "including an initial list and an end list" and a plug-in manager which "starts plug-ins on the initial list prior to plug-ins on the end list." As described above, the player of the Huntington reference searches for instructions in a second storage element during a boot sequence. The instructions relate to an event (or condition) which the player should monitor during the boot sequence. Thus, these instructions in the second storage element have no relation to a start-up sequence for applications or plug-ins and do not teach any element of claim 1.

The Huntington reference goes on to disclose that if the event occurs, the player writes instructions to the first storage element. During the start-up sequence for the operating system, the product controller checks the first storage element and executes the instructions in the first storage element or if no instructions are present, executes the normal start sequence. Thus, it appears the Examiner may be considering that the instructions in the first storage element are the

initial list and the normal start sequence is the end list.

However, the Huntington reference never discloses any requirements for the "instructions" written to the first storage element. There is no indication as to what these "instructions" include. While the Huntington reference describes that these instructions are related to the starting of an application, there is no indication that these instructions relate in any manner to the sequence of the loading of all applications. The product controller will look, in the first instance, at the "instructions" on the first storage element, but the reference does not disclose that those "instructions" indicate that the applications associated with those "instructions" should be started prior to the applications on the normal start sequence.

Accordingly, the Huntington reference neither teaches nor discloses "start[ing] the plug-ins on the initial list prior to plug-ins on the end list" as required by claim 1. Thus, the applicants respectfully request the Examiner to withdraw the rejection of claim 1 and all claims depending therefrom (claims 2-9) under the Huntington reference.

While the applicants maintain that claims 3 and 4 are allowable because they depend on claim 1, the applicants further point out that there is no teaching or suggestion of a plug-in structure including "a variable," wherein the plug-in manager "starts plug-ins unlisted on the initial list and the end list between the plug-ins on the initial list and the end list when the variable is set" as recited in claim 3 or when the plug-in manager "starts plug-ins unlisted on the initial list and end list in response to a request from a user" as recited in claim 4. The Huntington reference discloses the normal start-up sequence and the instructions in the first storage element. There are no other lists of plug-ins or applications disclosed that can be started without being in reference to the normal start-up sequence or first storage element. In addition,

there is no variable associated with a start-up of plug-ins or applications that are "unlisted" on an initial list or an end list as disclosed by the Huntington reference. Thus, for these additional reasons, claims 3 and 4 should be allowable.

Claim 10 recites a plug-in data structure which "includes an initial list and an end list" and a start-up sequence "including a first one of the plurality of plug-ins from the initial list being a first plug-in in the startup sequence, and a second one of the plurality of plug-ins from the end list being a last plug-in in the startup sequence, and manages the starting of the plug-ins in an order the plug-ins appear in the startup sequence." Thus, for the same reasons as described above with reference to claim 1, it is respectfully submitted that claim 10 and all claims depending therefrom (claims 13-15) are also allowable over the Huntington reference.

Claim 16 recites "a reading element to retrieve plug-ins on one of an initial list and an end list" and "a starting element to start the retrieved plug-ins, wherein the plug-ins on the initial list are started prior to the plug-ins on the end list." Thus for the same reasons as described above with reference to claim 1, it is respectfully submitted that claim 16 and all claims depending therefrom (claims 17-20) are also allowable over the Huntington reference.

Claim 21 recites "reading a first set of plug-ins listed in an initial list; reading a second set of plug-ins listed in an end list; assembling a startup sequence from the first and second sets of plug-ins, wherein the first set of plug-ins is included in the startup sequence before the second set of plug-ins; and starting the plug-ins in the order corresponding to the startup sequence." Thus for the same reasons as described above with reference to claim 1, it is respectfully submitted that claim 21 and all claims depending therefrom (claims 22-24) are also allowable over the Huntington reference.

III. The Rejection Under 35 U.S.C. 102(e) as Anticipated by the Goldberg Reference Should be Withdrawn.

The Examiner also rejected each of the pending claims under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,430,556 to Goldberg et al. ("the Goldberg reference"). *Office Action*, Pages 3-4. The Goldberg reference discloses a system and method to standardize and store queries in such a way that it is easier and faster to generate and retrieve them. *Goldberg reference*, Abstract.

The Examiner states, with respect to claim 21, that the Goldberg reference teaches "reading a first set of plug-ins listed in an initial list (tool directory list) [and] reading a second set of plug-ins in an end list (user's home directory list)." *Office Action*, Page 4. The applicants respectfully disagree with the Examiner's reading of the Goldberg reference.

The Goldberg reference states that the generator receives information from a configuration file as the generator is starting up. *Goldberg reference*, col. 8, lines 52-54. The configuration file includes information "about the environment in which it is running and they include such information as the JDBC drivers that are available and the location of various software programs." *Id.*, at col. 8, lines 54-57. The Goldberg reference goes on to state that the generator first looks for the configuration file in the tool directory, then it looks to the user's home directory and then to a current directory. *Id.*, at col. 8, lines 60-64.

However, this does not disclose "reading a first set of plug-ins listed in an initial list" and "reading a second set of plug-ins listed in an end list" as related in claim 21. The Goldberg reference makes it clear that the generator looks for the configuration file in the tool directory first and then only goes to the user's home directory if the configuration file is not present in the

tool directory. If it finds the configuration file in the tool directory, there is no reason for it to search in another directory. Once the generator has the configuration file, it does not need a second copy of the configuration file. Thus, this is completely different from the reading of the initiated list and end list as recited in claim 21.

Furthermore, the Goldberg reference does not disclose “assembling a startup sequence from the first and second sets of plug-ins, wherein the first set of plug-ins is included in the startup sequence before the second set of plug-ins” and “starting the plug-ins in the order corresponding to the startup sequence” as recited in claim 21. As described above, the configuration file of the Goldberg reference includes specific information. However, none of this information is recited to the starting or the sequence of starting plug-ins or any other components. Accordingly, the applicants respectfully submit that the Goldberg reference neither teaches nor discloses the above related elements of claim 21 and respectfully request the Examiner to withdraw the 102(e) rejection of claim 21 and all claims depending therefrom (claims 22-24) under the Goldberg reference.

Independent claims 1, 10 and 16 include similar limitations as claim 21. Specifically, claim 1 recites a plug-in data structure “including an initial list and an end list” and a plug-in manager “to read the plug-in data structure and start plug-ins corresponding to an order in the plug-in data structure, wherein the plug-in manager starts plug-ins on the initial list prior to plug-ins on the end list.” Claim 10 recites a plug-in manager which “assembles a startup sequence from the plug-in data structure, the startup sequence including a first one of the plurality of plug-ins from the initial list being a first plug-in in the startup sequence, and a second one of the plurality of plug-ins from the end list being a last plug-in in the startup sequence, and manages

the starting of the plug-ins in an order the plug-ins appear in the startup sequence." Claim 16 recites "a reading element to retrieve plug-ins on one of an initial list and an end list" and "a starting element to start the retrieved plug-ins, wherein the plug-ins on the initial list are started prior to the plug-ins on the end list." Thus, for the same reasons as described above for claim 21, the 102(e) rejections of claims 1, 10 and 16 and all claims depending therefrom under the Goldberg reference should be withdrawn.

CONCLUSION

In view of the amendments and remarks submitted above, the Applicants respectfully submit that the present case is in condition for allowance. All issues raised by the Examiner have been addressed, and a favorable action on the merits is thus earnestly requested.

Respectfully submitted,

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By: 
Michael J. Marcin (Reg. No. 48,198)

FAY KAPLUN & MARCIN, LLP
150 Broadway, Suite 702
New York, NY 10038
(212) 619-6000 (phone)
(212) 619-0276 (facsimile)